

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

John Joseph Allen Bliss,

Plaintiff,

vs.

Pinnacle Financial Group
Incorporated,

Defendant.

No. _____

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff alleges as follows:

JURISDICTION AND VENUE

1. This action presents a federal question arising under 15 U.S.C. § 1692k.
2. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331.
3. Defendant is a Minnesota corporation with its principal place of business located at 7825 Washington Avenue South, Suite 310 in the City of Minneapolis, County of Hennepin, and State of Minnesota.
4. Venue in this Court is proper pursuant to 28 U.S.C. § 1391 because the sole Defendant resides in this judicial district and a substantial part of the events or omissions giving rise to this claim occurred in this judicial district.

CLAIMS ENTITLING PLAINTIFFS TO RELIEF

1. Defendant is a debt collector.
 2. Plaintiff is a consumer.
 3. Plaintiff is not a minor.
 4. Defendant engaged in communication with third parties without the prior consent of the Plaintiff given directly to Defendant or the express permission of a court of competent jurisdiction.
 5. Defendant's communications with third parties were not reasonably necessary to effectuate a postjudgment judicial remedy.
 6. Defendant's communications with third parties were in violation of 15 USC § 1692c(b).
 7. Defendant engaged in conduct the natural consequence of which was to harass, oppress, and abuse Plaintiff in connection with the collection of a debt allegedly owed by Plaintiff, including:
 - (a) Defendant's use of language the natural consequence of which was to abuse Plaintiff;
 - (b) Defendant causing Plaintiff's telephone to ring and engaging Plaintiffs in telephone conversation repeatedly and continuously with intent to annoy, abuse, or harass any person at the called number;
 - (c) engaging in communications with third parties.
- all of which are in violation of 15 U.S.C. § 1692d.

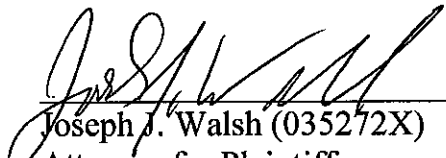
PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for damages in an amount to be proven at trial as follows:

1. Actual damages sustained by Plaintiff as a result of Defendant's violations of the Fair Debt Collection Practices Act pursuant to 15 U.S.C. § 1692k(a)(1).
2. Additional punitive damages in the amount of \$1,000 pursuant to 15 U.S.C. § 1692k(a)(2).
4. Costs of suit incurred herein, together with a reasonable attorney's fee, pursuant 15 U.S.C. § 1692k(a)(3).
5. Such other and further relief as the Court may deem just and proper.

CUROTT & ASSOCIATES, LLC

Dated: February 27, 2009



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